

COMMONWEALTH OF MASSACHUSETTS  
MIDDLESEX COUNTY, ss.

WALTHAM DISTRICT COURT  
C.A. NO.:

PANAGIOTA LORIDAS,	)
	)
Plaintiff,	)
v.	)
	)
COSTCO WHOLESALE	)
CORPORATION,	)
Defendant.	)
	)

### COMPLAINT AND DEMAND FOR JURY TRIAL

#### PARTIES

1. Plaintiff, Panagiota Loridas, is a natural person residing at 174 Spruce Street, Watertown, County of Middlesex, Commonwealth of Massachusetts.
2. Defendant, Costco Wholesale Corporation is a registered agent in C T Corporation System 155 Federal Street, Suite 700, Boston, MA, 02110, USA.

#### JURISDICTION AND VENUE

3. This Honorable Court has jurisdiction over the subject matter of this action pursuant to G.L. c. 218, § 19 because this action is a civil action for money damages where the amount of single damages claimed does not exceed \$25,000.
4. This Honorable Court has personal jurisdiction over Defendants pursuant to G.L. c. 223A, §§ 2 and 3 because the Defendants are domiciled in the Commonwealth of Massachusetts and/or transact business in the Commonwealth.
5. Venue is proper in this Honorable Court pursuant to G.L. c. 223, §§ 1 and 2 because this action is a transitory action brought in the judicial district where one of the parties lives or has his usual place of business or, in the alternative, this

action is a transitory action brought in a judicial district which adjoins the judicial district where one of the parties lives or has his usual place of business.

### **FACTUAL ALLEGATIONS**

6. On or about March 20, 2017, the Plaintiff, Panagiota Loridas was at Costco, walking towards the restrooms when she was caused to slip, trip, and/or fall by a negligently maintained wet floor under the care, custody, and/or control of Defendant, causing her to sustain personal injuries.
7. The Defendant, Costco Wholesale Corporation, owned, controlled, and/or maintained the property where the Plaintiff was injured.
8. The Plaintiff slipped on the wet floor and fell, landing on her right side and hitting her head on the ground.
9. The Plaintiff suffered a torn right rotator cuff and injuries to her right shoulder and elbow as a result of the slip, trip, and/or fall.

### **NEGLIGENCE**

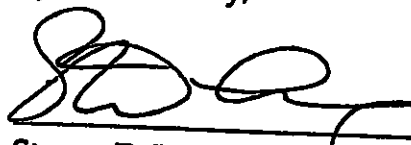
10. Plaintiffs hereby incorporate and reallege the above allegations with the same force and effect as if fully set forth herein.
11. The Defendant, Costco Wholesale Corporation, owed the Plaintiff, a lawful visitor, a duty of reasonable care.
12. The Defendant, Costco Wholesale Corporation, breached its duty of care by failing to warn visitors of the wet floor.
13. As a direct and proximate result of the negligence of the Defendant, Costco Wholesale Corporation, the Plaintiff suffered personal injuries for which they sought medical treatment and incurred medical expenses.

WHEREFORE, the Plaintiffs demand judgment against the Defendant for damages in an amount to be determined at trial plus interests and costs.

**JURY DEMAND**

The Plaintiff hereby demands a trial by jury on all issues so triable.

For the Plaintiff,  
Panagiota Loridas  
By her Attorney,

A handwritten signature in black ink, appearing to read 'S. Long', written over a horizontal line.

Steven R. Long; BBO No. 662625  
Cutler & Associates  
100 State Street, Suite 900  
Boston, MA 02109  
(617) 372-8160  
srlesq@gmail.com

Dated: 2-12-20

STATEMENT OF DAMAGES  
G.L. c. 218, § 19A(a)

Document 1-1 Filed 10/23/20 Page 4 of 4

Trial Court of Massachusetts



PLAINTIFF(s)

Panagiota Loidas

DEFENDANT(s)

Costco Wholesale Corporation

DATE FILED

INSTRUCTIONS: THIS FORM MUST BE COMPLETED AND  
FILED WITH THE COMPLAINT OR OTHER INITIAL  
PLEADING IN ALL DISTRICT AND BOSTON MUNICIPAL COURT CIVIL  
ACTIONS SEEKING MONEY DAMAGES.

COURT DIVISION

Waltham District Court

**TORT CLAIMS**

**AMOUNT**

A. Documented medical expenses to date:

1. Total hospital expenses: \$ 4,473.44  
2. Total doctor expenses: \$  
3. Total chiropractic expenses: \$  
4. Total physical therapy expenses: \$  
5. Total other expenses (describe) Ambulance \$ 1,460.00

SUBTOTAL:

\$  
\$  
\$  
\$  
\$  
\$ 19,066.56

B. Documented lost wages and compensation to date: .....

C. Documented property damages to date: .....

D. Reasonably anticipated future medical and hospital expenses: .....

E. Reasonable anticipated lost wages: .....

F. Other documented items of damage (describe): Pain and suffering

G. Brief description of Plaintiff's injury, including nature and extent of injury:

For this form, disregard double or treble damage claims; indicate single damages only.

TOTAL:

\$ 24,999.99

**CONTRACT CLAIMS**

**AMOUNT**

☐ This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a)

Provide a detailed description of the claim(s):

\$  
\$  
\$

For this form, disregard double or treble damage claims; indicate single damages only.

TOTAL:

\$

ATTORNEY FOR PLAINTIFF (OR UNREPRESENTED PLAINTIFF)

SIGNATURE

DATE

PRINT OR TYPE NAME

Steven R. Long

662625

B.B.O.#

ADDRESS

100 State Street, Suite 900, Boston, MA 02109

DEFENDANT'S NAME AND ADDRESS:

Costco Wholesale Corporation

155 Federal Street, Suite 700

Boston, MA 02110

CERTIFICATION PURSUANT TO SJC RULE 1:18: I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.

Signature of Attorney on Record:

12 18

7-17-20